Benard V. Preziosi, Jr. (BP - 5715) CURTIS, MALLET-PREVOST, **COLT & MOSLE LLP** 101 Park Avenue New York, NY 10178 Tel: (212) 696-6000 Fax: (212) 697-1559 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK INVISTA B.V., et al.

v.

APR 30 ZOUB

08 CV 3063 (SHS)

MOTION TO ADMIT COUNSEL

**PRO HAC VICE** 

E.I. DU PONT DE NEMOURS AND COMPANY, :

Defendant.

Plaintiffs,

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Benard V. Preziosi, Jr., a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission pro hac vice of

> Raymond F. Geoffroy, III Litigation Department INVISTA S.à r.l. 4123 E. 37<sup>th</sup> Street North Wichita, KS 67220

Phone Number: (316) 828-1530 Fax Number: (316) 828-1180

Raymond F. Geoffroy, III is a member in good standing of the Bars of the States of Kansas and Virginia. There are no pending disciplinary proceedings against Raymond F. Geoffroy, III in any State or Federal court.

Dated: April 30, 2008 New York, New York

Respectively submitted,

Benard V. Preziosi, Jr. (BP-5715)

Curtis, Mallet-Prevost, Colt & Mosle LLP

101 Park Avenue

New York, New York 10178

Phone: (212) 696-6198 Fax: (212) 697-1559 Benard V. Preziosi, Jr. (BP-5715) CURTIS, MALLET-PREVOST, **COLT & MOSLE LLP** 101 Park Avenue New York, NY 10178 Tel: (212) 696-6000 Fax: (212) 697-1559 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK INVISTA B.V., et al. Plaintiffs, 08 CV 3063 (SHS) v. **AFFIDAVIT OF BENARD V. PREZIOSI** IN SUPPORT OF MOTION TO ADMIT COUNSEL E.I. DU PONT DE NEMOURS AND COMPANY, : **PRO HAC VICE** Defendant. STATE OF NEW YORK ss: COUNTY OF NEW YORK

BENARD V. PREZIOSI, being duly sworn, hereby deposes and says:

1. I am a member of the firm Curtis, Mallet-Prevost, Colt & Mosle LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Raymond F. Geoffroy, III as counsel pro hac vice to represent Plaintiffs in this matter.

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I am a member in good standing of the Bar of the State of New York, and was 2.

admitted to practice law on June 1, 1983. I am also admitted to the Bar of the United States

District Court for the Southern District of New York, and am in good standing with this Court.

3. Raymond F. Geoffroy is Chief Counsel of Litigation and Compliance at

INVISTA S.à r.l. in Wichita, Kansas. Mr. Geoffroy is a member in good standing of the Bars of

the States of Virginia and Kansas. (Certified copies of Mr. Geoffroy's certificates of good

standing in the Bars of Virginia and Kansas are annexed hereto as Exhibit A and Exhibit B).

I have been working with Mr. Geoffroy in connection with this matter and have 4.

found him to be a skilled attorney and a person of integrity. He is experienced in Federal

practice and is familiar with the Federal Rules of Procedure.

Accordingly, I am pleased to move for the admission of Mr. Geoffroy, pro hac 5.

vice.

I respectfully submit a proposed order granting the admission of Mr. Geoffroy, 6.

pro hac vice, which is attached hereto as Exhibit C.

WHEREFORE it is respectfully requested that the motion to admit Raymond F. Geoffroy, III pro

hac vice, to represent Plaintiffs in the above-captioned matter, be granted.

Dated: April 30, 2008

New York, New York

Respec

Benard V. Preziosi, Jr. (BP-5715)

Sworn to before me on April 30, 2008

JACQUELINE T. DIMARCO Notary Public, State of New York No. 31-4841199 Qualified in New York County

Commission Expires Oct. 31, 2009

EXHIBIT A



# Virginia State Bar

Eighth and Main Building 707 East Main Street, Suite 1500 Richmond, Virginia 23219-2800 Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

April 25, 2008

### Certificate of Good Standing

This is to certify that Raymond Francis Geoffroy III is an active member of the Virginia State Bar in good standing, licensed to practice law in Virginia since December 10, 1998, after successfully passing the bar examination given by the Virginia Board of Bar Examiners.

The Virginia State Bar is the mandatory bar in Virginia, and all disciplinary actions against Virginia licensed attorneys are handled by this office. A careful search of the Virginia State Bar records has been made, and no record has been found of any public or private disciplinary sanctions imposed upon Mr. Geoffroy for misconduct as defined by the rules of professional conduct.

Barbara Sayers Lanier

Clerk of the Disciplinary System

EXHIBIT B

## The Supreme Court of Kansas



### Certificate of Good Standing

I, Carol G. Green, Clerk of the Supreme Court of the State of Kansas, do hereby certify that the Supreme Court of Kansas is the highest court of law, and the court of last resort within the State of Kansas, and has exclusive jurisdiction over and control of the admission of applicants to the bar of this state.

I do further certify that on \_\_\_\_\_October 13, 2006

#### RAYMOND FRANCIS GEOFFROY, III

was duly admitted to practice as an attorney and counselor of the Supreme Court and all other courts of the State of Kansas and is, on the date indicated below, a member in good standing of the Kansas Bar.

**ACTIVE STATUS** 

Clerk of the Supreme Court of Kansas

EXHIBIT C

Benard V. Preziosi, Jr. (BP-5715) CURTIS, MALLET-PREVOST, **COLT & MOSLE LLP** 

101 Park Avenue New York, NY 10178

Tel: (212) 696-6000 Fax: (212) 697-1559

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

INVISTA B.V., et al.

Plaintiffs,

v. 08 CV 3063 (SHS)

**ORDER FOR ADMISSION** E.I. DU PONT DE NEMOURS AND COMPANY, : PRO HAC VICE

**ON WRITTEN MOTION** 

Defendant.

Upon the motion of Benard V. Preziosi, Jr., attorney for Plaintiffs INVISTA B.V. et al. and said sponsor attorney's affidavit in support;

#### IT IS HEREBY ORDERED that

Raymond F. Geoffroy, III Litigation Department INVISTA S.à r.l. 4123 E. 37<sup>th</sup> Street North Wichita, KS 67220

Phone Number: (316) 828-1530 Fax Number: (316) 828-1180

Email Address: ray.geoffroy@invista.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing

discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2008 New York, New York

United States District / Magistrate Judge

### **AFFIDAVIT OF SERVICE BY HAND**

Filed 04/30/2008

STATE OF NEW YORK	)	
	)	SS.
COUNTY OF NEW YORK	)	

Daren Hunter, being duly sworn, deposes and says:

I am over the age of eighteen years and am not a party to this action.

On April 30, 2008, I served a copy of the attached Motion To Admit Counsel Pro

Hac Vice by hand upon:

Robert Jeffrey Dwyer Boies Schiller & Flexner, LLP 575 Lexington Avenue New York, New York 10022

Sworn to before me this 30th day of April, 2008

LYNN M. MOONEY
Notary Public, State of New York
No. 01MO4841073
Qualified in Queens County
Certificate Filed in New York County
Commission Expires June 30, 20

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